

Arent Fox LLP / Attorneys at Law
Los Angeles, CA / New York, NY / San Francisco, CA / Washington, DC
www.arentfox.com

March 1, 2019

Stephanie A. Joyce

Partner 202.857.6081 DIRECT stephanie.joyce@arentfox.com

VIA ECFS

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: WC Docket No. 12-375, Public Submission for Mandatory Data Collection ("MDC")
VOLUMINOUS FILING

Dear Secretary:

Securus Technologies, Inc. ("Securus"), through counsel, submits this public, redacted version of its MDC filing via ECFS in compliance with the Commission's Instructions¹ and the requirements of Paragraphs 197-202 and 308 of the 2015 *Inmate Rate Order*.²

This public ECFS filing is comprised of two parts: presently available financial statements; and the Description and Justification. The populated Excel spreadsheet, based on the Commission's template, is too voluminous to be filed via ECFS. Undersigned counsel has discussed with Staff the need to file the spreadsheet separately via disk.

Please date-stamp the enclosed copy of this letter and return it to the bearer.

Thank you for your consideration.

Sincerely,

s/Stephanie A. Joyce Counsel to Securus Technologies, Inc.

Enclosures

cc: Gil Strobel, Pricing Policy Division, Wireline Competition Bureau (via electronic mail)

WC Docket No. 12-375, Wireline Competition Bureau Announces Due Dates for Inmate Calling Services Information Collections and Consumer Disclosure Requirements, DA 17-209 (Mar. 2, 2017).

WC Docket No. 12-375, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd. 12763, 12862-64, 12908 (2015).